

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF NEW YORK

SONIA DOTSON,

Plaintiff,

v.

04-CV-1388

THE CITY OF SYRACUSE; THE CITY OF
SYRACUSE POLICE DEPARTMENT; FORMER
CHIEF OF POLICE DENNIS DUVAL; SGT.
TIMOTHY GAY; MARK McCARDLE¹;
PATRICK HARRINGTON; MICHAEL
RATHBUN,

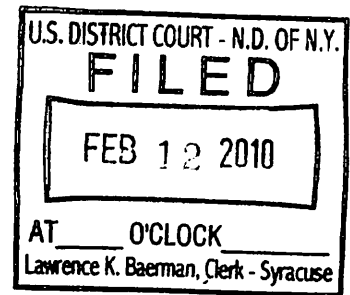
Defendants.

VERDICT SHEET

PLEASE NOTE - Each Juror will be provided with a Verdict Form in order to facilitate understanding of the charge and to aid in deliberation as to the elements of each claim. HOWEVER, YOUR VERDICT SHOULD BE REPORTED TO THE JUDGE ON ONLY ONE VERDICT FORM WHICH IS SIGNED BY THE JURY FOREPERSON. The remaining Verdict Forms should be returned to the courtroom deputy unsigned.

ALSO, please carefully follow the bold-type directions accompanying each question.

¹ Defendant's name is misspelled in the caption. The correct spelling is "McArdle".



Title VII and Human Rights Law – Retaliation

As to Defendant City of Syracuse - Title VII and Human Rights Law

1. Do you find by a preponderance of the evidence, that the **City of Syracuse** unlawfully retaliated against plaintiff for engaging in a protected activity ?

YES 6

NO 2

Proceed to next question only if you answered "YES" to Question 1. If you answered "NO" to Question 1, then proceed to Question 5.

2. Has plaintiff proven by a preponderance of the evidence that she sustained injuries that were proximately caused by the unlawful retaliation by defendant **City of Syracuse**?

YES 6

NO 2

Proceed to next question only if you answered "YES" to Question 2. If you answered "NO" to Question 2, then proceed to Question 5.

3. What amount, if any, do you award plaintiff in compensatory damages against defendant **City of Syracuse**?

\$ 175,000.00

Proceed to next question.

4. **Note: you may not award nominal damages against any defendant against whom you have awarded compensatory damages.**

What amount, if any, do you award as nominal damages to plaintiff against defendant **City of Syracuse**?

\$ _____

Proceed to next question.

As to Defendant Timothy Gay - Human Rights Law

5. Do you find by a preponderance of the evidence, that **Timothy Gay** unlawfully retaliated against plaintiff for engaging in a protected activity ?

YES 6

NO 2

Proceed to next question only if you answered "YES" to Question 5. If you answered "NO" to Question 5, then proceed to Question 8.

6. Has plaintiff proven by a preponderance of the evidence that she sustained injuries that were proximately caused by the unlawful retaliation by defendant **Timothy Gay**?

YES 6

NO 2

Proceed to next question only if you answered "YES" to Question 6. If you answered "NO" to Question 6, then proceed to Question 8.

7. What amount, if any, do you award plaintiff in compensatory damages against defendant **Timothy Gay**?

\$ 125,000.00

Proceed to next question.

As to Defendant Mark McArdle - Human Rights Law

8. Do you find by a preponderance of the evidence, that **Mark McArdle** unlawfully retaliated against plaintiff for engaging in a protected activity ?

YES 6

NO 2

Proceed to next question only if you answered "YES" to Question 8. If you answered "NO" to Question 8, then conclude your deliberations and report your verdict to the marshal.

9. Has plaintiff proven by a preponderance of the evidence that she sustained injuries that were proximately caused by the unlawful retaliation by defendant **Mark McArdle**?

YES 6

NO 2

Proceed to next question only if you answered "YES" to Question 9. If you answered "NO" to Question 9, conclude your deliberations and report your verdict to the marshal.

10. What amount, if any, do you award plaintiff in compensatory damages against defendant **Mark McArdle**?

\$ 150,000.00

REPORT YOUR VERDICT TO THE MARSHAL. PLEASE REMEMBER TO SIGN AND DATE YOUR VERDICT SHEET.

Dated: February 12, 2010
Syracuse, New York

For